REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith.

I.   STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 1-3 and 5-7 are pending. Claims 1 and 5, which are independent, are hereby amended. Claims 4 and 8 had been canceled without prejudice or disclaimer of subject matter. Support for the amendments is provided throughout the Specification, specifically at page 9.

No new matter has been introduced. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

II.   REJECTIONS UNDER 35 U.S.C. §103(a)

Claims 1-3 and 5-7 were rejected under 35 U.S.C. 103(a) as allegedly unpatentable over U.S. Patent No. 6,757,694 to Goodman et al. (hereinafter, merely "Goodman") in view of U.S. Publication No. 2002/0161852 to Allen et al. (hereinafter, merely "Allen") and in further view of U.S. Patent No. 6,880,101 to Golasky et al. (hereinafter, merely "Golasky").

III.   RESPONSE TO REJECTIONS

Claim 1 recites, *inter alia*:

"A tape library apparatus to which a node ID is assigned and that is connected to a host computer, comprising:

...wherein selected drives are assigned respective node IDs as first addresses and respective port IDs that represent mounted order numbers as second addresses and the interfaces are activated, **the first address being used to determine whether a drive is new and the second address being used to determine whether a mounted drive is moved to a different port,**

wherein the first addresses and the second addresses are stored in a nonvolatile memory disposed in corresponding drive..."
(emphasis added)

As understood by Applicant, Goodman relates to network devices in a storage system implementing names for enabling communication with the devices via identifying and assigning names to devices connected in networks. Assignment of names to existing library storage products provisioned requires allocation of unique names according to the serial numbers of each existing automated library storage product.

As understood by Applicant, Allen relates to a method and system for using a Fibre Channel for tracking remote devices with unknown configurations used by Fibre Channel connected devices. Communication with a remote device takes place if the identified device identifier matches the previously stored device identifier.

As understood by Applicant, Golasky relates to a system and method for providing automatic data restoration after a storage device failure. An agent maps spare logical units to an address associated with a host in response to detecting the failure at a logical unit.

First, Applicant respectfully submits that Goodman, Allen and Golasky, taken alone or in combination, fail to teach or suggest "wherein selected drives are assigned respective node IDs as first addresses and respective port IDs that represent mounted order numbers as second addresses and the interfaces are activated, the first address being used to determine

whether a drive is new and the second address being used to determine whether a mounted drive is moved to a different port", as recited in claim 1 (emphasis added).

Second, the Office Action (see page 4) relies on column 2, lines 62-64 and column 4, lines 53-55 of Goodman to reject wherein the first addresses and the second addresses are stored in a nonvolatile memory disposed in corresponding drives, as recited in claim 1 (emphasis added). Column 2, lines 62-64 of Goodman describes a non-volatile memory 26 shown in Figure 3 for storing serial number identifiers. Applicant respectfully submits that the non-volatile memory 26 is outside of the drive as shown in figure 3 of Goodman in direct contrast with Applicant's claimed a nonvolatile memory disposed in corresponding drives. Column 4, lines 53-55 of Goodman describes that "the base WWN is stored in nonvolatile memory somewhere in the library." Applicant respectfully submits that Goodman stores WWN in nonvolatile memory somewhere in the library in direct contrast with Applicant's claimed a nonvolatile memory disposed in corresponding drives. Applicant respectfully submits that Goodman, Allen and Golasky, taken alone or in combination, fail to teach or suggest the above-identified features of claim 1.

Therefore, Applicant respectfully submits that claim 1 is patentable.

For reasons similar to those described above with regard to independent claim 1, claim 5 is also patentable.

IV.   DEPENDENT CLAIMS

The other claims are dependent from independent claim 1 and 5, discussed above, and are therefore believed patentable for at least the same reasons. Since each dependent claim

is also deemed to define an additional aspect of the invention, however, the individual

reconsideration of the patentability of each on its own merits is respectfully requested.
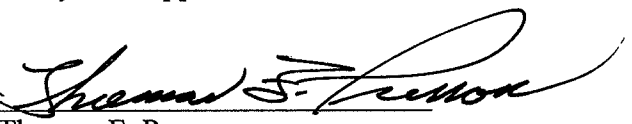
CONCLUSION

In the event the Examiner disagrees with any of the statements appearing above

with respect to the disclosures in the cited reference, or references, it is respectfully requested

that the Examiner specifically indicate the portion, or portions, of the reference, or references,

providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any

overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the

claims in this application are patentable and Applicant respectfully request early passage to issue

of the present application.

Respectfully submitted,

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